

EXHIBIT 11

On Apr 24, 2018, at 12:57 PM, Chris Tisi <ctisi@levinlaw.com> wrote:

Lorna and Mark:

I just wanted to follow up on our call for Thursday. Has a time been set? If not, can we have it late afternoon as leigh is on a plane.

With respect to the topics we should probably discuss:

- What have we resolved/not resolved with the 30(B)(6) notice?
- Do we have a final position from Imerys on the 3rd P witnesses?
- Do we need to have a discussion on Privilege issues (I have not had a chance to follow up with Warren and Amanda so forgive me if you have already addressed this)

I also wanted to take a moment and have an informal discussion about some issues that have come up recently primarily as a result of The Lanzo evidence. While we expect to write a formal letter, we thought it might be useful in light of our past dealings to at least preview them with you on Thursday.

So you can at least be prepared, these are the issues:

- Julie Piers testified that TEM grids containing portions of samples upon which she performed testing were maintained. To our knowledge, none of these grids were disclosed to the PSC in the samples inventory provided to the PSC nor were they included in the exhibit to the samples protocol. Obviously, this is of some concern and we need to find out what happened and obtain these expeditiously;
- A 2009 email which was produced to us in Feb 2018 indicates that Imerys maintained in storage Grade 66 talc samples (the same talc used in JJ Powder) from 1967-1984. Your prior disclosure in the MDL does not list samples from this timeframe and we need an explanation as to what happened and where these are and how to obtain these expeditiously.
- We need to make arrangements to inspect the drilling cores from the Vermont mines that sourced talc products for J&J powders
- There are also some other issues from Ms. Piers testimony that we are investigating further but may need to discuss.

Let us know when you would like to speak

Chris

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